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April 22, 2003

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Jim Christiansen
EPA Region VIII
999 18th Street, Suite 300
Denver, CO 80202

EPA REGION VIII
SUPERFUND BRANCH

SUBJECT: Addendum to the Remedial Action Work Plan – BNSF Libby
Railyard Biotite Removal, Libby, Montana
EMR Project No. 5539.003-1

Dear Mr. Christiansen,

On behalf of the Burlington Northern and Santa Fe Railway Company (BNSF) EMR is requesting a modification of the subject Work Plan to provide for the following changes.

1. Change in the interval for work to be conducted from May 1 to August 30, 2003 as weather conditions allow and the Lincoln County landfill is permitted by EPA to receive materials from Libby, but no sooner than the date that the Administrative Order on Consent has been executed.
2. Change in material transfer method to allow for decontamination of the vacuum truck and transport of impacted soil within the vacuum truck to the landfill.

The original start and completion dates have come and gone; the project was not initiated last October because of weather. The new interval for work includes a possible start date of May 1, 2003 and the new completion date of August 30, 2003.

As outlined in the Work Plan, impacted soil was to be transferred within the exclusion zone by auguring into dump trucks. After discussions with the subcontractor and the landfill, it has been concluded that the goal of zero emissions can be achieved more readily by transferring the impacted soil at the landfill. The vacuum trucks, therefore, will be decontaminated within the contaminant reduction zone, and then be driven to the landfill. Once at the landfill, the vacuum truck will be emptied by the auger method.

EMR hopes that these modifications meet with EPA's approval on this project. If, you have any questions after reviewing these comments, please call me at (425) 861-4561. Otherwise, please indicate EPA's consent in writing, per the Administrative Order on Consent.

Very Truly Yours,

Don Clabaugh, PE
Principal Engineer

cc: Richard Sisk, EPA; Dave Smith, BNSF; Pamela Nehring, BNSF